

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

AARON ABADI, )  
Plaintiff, )  
v. ) Case No. 1:23-cv-04033-LJL  
AMERICAN AIRLINES, INC., et al., )  
Defendants. )

## **NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, dated November 28, 2023, and upon all prior pleadings and proceedings in this action, Defendants American Airlines, Inc., Delta Air Lines, Inc., JetBlue Airways Corporation, Southwest Airlines Co., and United Airlines, Inc. (the “Five Airline Defendants”), and Robert Land, Debbie Castleton and Nathalie Simon (collectively, with the Five Airline Defendants, the “Moving Defendants”), by and through their attorneys, Stinson LLP, shall move this Court at the United States District Court for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, NY 10007, before the Honorable Lewis J. Liman, United States District Judge, on a date and time to be set by the Court, for an order pursuant to Rule 12(c) of the Federal Rules of Civil Procedure dismissing Count 7 of the Plaintiff’s Complaint (ECF No. 3-1) and for such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs will be required to respond pursuant to a briefing schedule to be set by the Court (or, in the absence of a specific order, by Local Rule 6.1(b)).

Dated: New York, New York  
November 28, 2023

Respectfully submitted,

**STINSON LLP**

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